

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554
September 27, 1995

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Amendment of the Commission's)
Rules and Policies to Increase)
Subscribership and Usage of the)
Public Switched Network)

CC Docket No. 95 - 115

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COMMENTS OF
THE CONSORTIUM FOR SCHOOL NETWORKING,
UNITED STATES DISTANCE LEARNING ASSOCIATION,
NATIONAL EDUCATION ASSOCIATION,
ORGANIZATIONS CONCERNED ABOUT RURAL EDUCATION,
NATIONAL SCHOOL BOARDS ASSOCIATION,
NATIONAL ASSOCIATION OF INDEPENDENT SCHOOLS,
COUNCIL FOR AMERICAN PRIVATE EDUCATION,
COUNCIL OF CHIEF STATE SCHOOL OFFICERS,
AMERICAN LIBRARY ASSOCIATION

The following comments are submitted by the above education, library, and public interest groups.

We would like to comment on subscribership in schools, libraries, and rural communities -- especially as it affects the ability of schoolchildren and other citizens to gain access to the Internet and other online information services.

Here are three major problems that we hope the Commission can address:

- Many classrooms, schools, and libraries do not have phone lines or access to telephones. This is not only a safety problem, but phone lines are necessary if

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schools want to have access to the Internet and online services. Schools and libraries pay commercial rates. It is ironic that, for example, a "lone eagle" bond salesman working at home in the Rocky Mountains pays residential rates while a school with limited funds has to pay commercial rates to have a telephone in the classroom.

- Some libraries and schools have become the hub so that underserved people in the community can have access to the Internet and online information services. In order for all people to have affordable access, schools and libraries should be supported under the universal service mechanism. For example, a person who can't afford a computer and modem can go to a library to gain access to public information such as that on the "Thomas" home page (World Wide Web site on the Internet) that the U.S. House of Representatives has set up.
- In rural areas, schools, teachers, libraries, and the citizens they serve often have to make toll calls to get to the Internet and online information services. People in rural areas pay much more than people in urban areas do to get access to information. This is largely because it is costly for Internet service providers to put access points in areas that don't have a certain population density. The result is that people in rural areas are becoming the "have nots" of the information age.

Since 1934, this country's universal service policy has been intended to "make available, so far as possible, to all people of the United States a rapid, efficient, nationwide, and world-wide wire and radio communication service with adequate facilities at reasonable charges...." (Section 1 of the Communications Act of 1934, as amended, 47 U.S.C. # 51)

The meaning of this principle has not, however, remained constant over time. While for many years it was important only to ensure the existence of a telephone line in every home, school, and library building, Universal Service must mean much more today. The Internet and other dial-up online services are able to provide information, education, library services, health care and so much more to citizens in rural and low-income areas at very low cost. The largest problem has been giving the people in those communities the tools they need in order for them to have meaningful access to computer networks at affordable rates. Since it would be virtually impossible and prohibitively

expensive to ensure that every American home had affordable access to the Internet, the Commission must look for ways to accomplish universal accessibility without necessarily having universal service. We believe that the best way to accomplish these goals is to ensure service in every classroom and library in this country.

As growth in subscribership shows, our country's universal service policies have met with significant success. Each of the programs initiated to promote these policies has contributed to rise in telephone subscribership.

While we want all citizens to have affordable access to information services as a new kind of universal service, lack of subscribership within schools and libraries is a major concern. Schoolchildren, as a population, are underserved and should have affordable access. A report released by the National Center for Education Statistics (NCES) in February, 1995, shows that less than three percent of American classrooms have access to the Internet and advanced telecommunications services for instructional purposes. A similar study by the National Commission on Libraries and Information Services (NCLIS) shows that only 13 percent of our public libraries in rural areas have any kind of access to the Internet.

Schools and libraries can become the access points so that all citizens can have affordable access to information. Access to the Internet through schools and libraries -- or other access points such as community colleges and community centers -- can become a cost-effective way for the country to expand subscribership to all Americans. Otherwise, many people, simply because they do not have proper equipment, will become information "have nots."

There is another problem that has to be addressed in rural areas. K-12 schools, public libraries, teachers, parents, and other citizens in these areas have to pay substantially more than their urban counterparts do in order to have access to online information services and advanced telecommunications, such as the Internet. A school or library in Java, South Dakota, or Rochester, Vermont, for example, can become the access point for citizens in those communities to learn from the "Thomas home page" (an online database with public information

provided by Congress). A school or library can be the access point where people gain access to online information that can improve health or help with economic development. Yet, because Java, South Dakota, and Rochester, Vermont, are in places with low population density, commercial Internet and advanced telecommunications services do not provide local dial-in or access points. Teachers, students, and other citizens in these communities are forced to make toll, long-distance calls to access points in towns or cities with a higher population density (areas where it is more attractive for commercial services to provide local access points). For those in rural areas, the cost of paying toll calls -- in addition to the fee for the service -- is prohibitive, so people in these areas of the country remain disconnected and become the disenfranchised of our country. These people in rural areas, because they are so isolated, need online access to public information the most.

The Internet and other online services are not just luxuries. In a time of significant budget cutting for education services all around this country, these computer networks can ensure that traditionally excluded communities do not become increasingly disenfranchised. Computer networks permit citizens to have access to education, information, and critical services regardless of their location or income. If the Commission establishes universal service policies that ensure that there are meaningful access points to such networks in communities all over America, people who have already been living at an information disadvantage will no longer be in that position. We believe that schools and libraries are the best places to start.

If schools or libraries in all communities (not just rural communities) are to become the access points to public information for students, teachers, and all citizens, then the universal service mechanisms of this country must be expanded to allow schools and libraries to have affordable access to advanced telecommunications. Furthermore, universal services policies must be flexible enough so that a school or library can become the "anchor tenant" and provide access to advanced telecommunications services for all citizens in the community, including small businesses, and agencies that can contribute to economic development.

Until the universal service mechanism is expanded, there will be a gap

between the information "haves" and "have nots." This disparity is not unlike the one this country would have had earlier in this century had a rural subscriber paid the market price for "plain old telephone service." Universal service mechanisms in the Communications Act of 1934 solved the affordable access problems then; additional universal service measures are necessary now. The public interest is served and economic development is improved when all Americans have affordable access to advanced telecommunications services. The universal service mechanisms of this country must be revised so that we can assure that schools and libraries -- and the citizens they serve -- have affordable access.

We cannot expect to increase the productivity of our schools and increase the learning at the rates that are needed without affordable access to technology.

The National Information Infrastructure (NII) and a technologically literate public, together form the foundation of America's future competitiveness and economic growth. However, without a national commitment to ensuring affordable access to emerging telecommunications, the United States will fall short in preparing all of its citizens to compete in the new global, information-based economy. And it is clear that commitment has not yet been made.

Those who make public communications policy must recognize the critical role of public libraries in providing information services to the communities they serve. More importantly, they must recognize that unless schools and libraries and the people they service are able to access the NII affordably, the tremendous resources available on the information superhighway will not be utilized to their fullest potential.

We encourage you to ensure that elementary and secondary schools and public libraries -- especially those in rural areas -- have affordable access to the telecommunications and information technologies which are the future of American prosperity.

As we all know, technologies have changed significantly since 1934. We agree that additional measures may be necessary in order for the FCC to carry out its mandate of providing communication service to all Americans. We urge you to expand the definition of universal service so that schoolchildren have affordable

access to telephones and information services -- and so that all Americans have affordable access to the Internet advanced telecommunications services.

We look forward to submitting more detailed comments in the reply period.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "W. Wright, Jr.", with a large, stylized initial "W" and a long, sweeping underline.

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